

**FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TQ DELTA, LLC,

*Plaintiff,*

v.

COMMSCOPE HOLDING COMPANY,  
INC., COMMSCOPE, INC., ARRIS US  
HOLDINGS, INC., ARRIS SOLUTIONS,  
INC., ARRIS TECHNOLOGY, INC., and  
ARRIS ENTERPRISES, LLC,

*Defendants.*

Civil Action No.: 2:21-cv-00310-JRG

**DECLARATION OF LANA SHIFERMAN IN SUPPORT OF  
COMMSCOPE’S OPPOSITION TO PLAINTIFF TQ DELTA, LLC’S MOTION TO  
STRIKE PORTIONS OF THE EXPERT REPORT OF STEPHEN L. BECKER, Ph. D**

I, Lana Shiferman, declare:

1. I am a partner at Goodwin Procter LLP, counsel of record for Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology (collectively, “CommScope”). I am over the age of 18 years, have personal knowledge of the matters in this declaration, and if called as a witness, I would and could competently testify to them.

2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the Expert Report of Stephen L. Becker, Ph.D., dated November 18, 2022.

3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the Expert Report of Vijay Madiseti, Ph.D., on Infringement of the Family 4 and Family 6 Patents, dated August 29, 2022.

4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the Expert

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Report of Arthur Brody, Ph.D., on Infringement of the Family 1 and Family 10 Patents by CommScope, dated August 29, 2022.

5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the Opening Expert Report of Todor Cooklev, Ph.D., dated August 29, 2022.

6. Attached hereto as **Exhibit E** is a true and correct copy of the errata to the transcript of the December 7, 2022 deposition of Dr. Niel Ransom.

7. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from the transcript of the December 7, 2022 deposition of Dr. Stephen Becker.

8. Attached hereto as **Exhibit G** is a true and correct copy of excerpts from the Expert Report of Vijay Madiseti, Ph.D., on Infringement of U.S. Patent No. 8,462,835 (Family 6), dated July 10, 2020, submitted in *TQ Delta, LLC v. 2Wire, Inc.*, C.A. No. 1:13-cv-01835-RGA (D. Del Nov. 4, 2013).

9. Attached hereto as **Exhibit H** is a true and correct copy of excerpts from the Expert Report of Todor Cooklev, Ph.D., Regarding Infringement of the Family 3 Patents, dated November 28, 2018, submitted in *TQ Delta, LLC v. 2Wire, Inc.*, C.A. No. 1:13-cv-01835-RGA (D. Del Nov. 4, 2013).

10. Attached hereto as **Exhibit I** is a true and correct copy of excerpts from the transcript of the December 8, 2022 deposition of Dr. Todor Cooklev.

11. Attached hereto as **Exhibit J** is a true and correct copy of excerpts from the data sheet for BCM63148, bearing Bates numbers BRCM028148–477.

12. Attached hereto as **Exhibit K** is a true and correct copy of excerpts from the data sheet for BCM63168, bearing Bates numbers BRCM09978–10499.

13. Attached hereto as **Exhibit L** is a true and correct copy of excerpts from the

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transcript of the August 24, 2022 deposition of Dr. Gong-San Yu.

14. Attached hereto as **Exhibit M** is a true and correct copy of excerpts from the August 12, 2022 deposition of Jaime Salazar.

15. Attached hereto as **Exhibit N** is a true and correct copy of excerpts from July 28, 2022 deposition of Benjamin Miller.

16. Attached hereto as **Exhibit O** is a true and correct copy of excerpts from the Corrected Expert Report of Jonathan D. Putnam, dated September 3, 2022.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 6, 2023, in Boston, Massachusetts.

/s/ Lana Shiferman  
Lana Shiferman